

**UNITED STATES DISTRICT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<p><b>(1) KATHRYN TAYLOR,</b></p> <p style="text-align: center;"><b>Plaintiff,</b></p> <p><b>vs.</b></p> <p><b>(1) AIG PROPERTY CASUALTY COMPANY, and</b></p> <p><b>(2) ROBERTSON TAYLOR INTERNATIONAL INSURANCE BROKERS, INC.,</b></p> <p style="text-align: center;"><b>Defendants.</b></p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p><b>Case No. 17-cv-525-CVE-JFJ</b></p>
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**DEFENDANTS’ JOINT NOTICE OF REMOVAL**

COME NOW, Defendant AIG Property Casualty Company (“AIGPCC”), and Defendant Integro USA Inc., (“Integro”) as successor-by-merger to Robertson Taylor International Insurance Brokers, Inc. (the latter of which, although named as a defendant in this case, has been merged into Integro and therefore no longer exists), and hereby remove this civil action which was originally filed in the District Court of Tulsa County, Oklahoma, Case No. CJ-2017-2910 (the “State Action”), to the United States District Court for the Northern District of Oklahoma, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446.1 and would respectfully show the Court as follows:

1. This is an action of a civil nature over which the District Courts of the United States of America have original jurisdiction pursuant to 28 U.S.C. § 1332 because complete diversity of citizenship existed at the time of the filing of this action and still

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1 On September 7, 2017, Plaintiff dismissed defendant American International Group, Inc. from the State Action without prejudice. *See* Exhibit 7 hereto.

exists as between Plaintiff Kathryn Taylor and Defendants AIGPCC and Integro, and the amount in controversy exceeds the sum of \$75,000, exclusive of any interest and costs.

2. Under 28 U.S.C. §§ 1441 and 1446, Defendants have the right to remove the State Action from the District Court of Tulsa County, Oklahoma, to the United States District Court for the Northern District of Oklahoma, which is the federal district in which the action is pending.

3. Plaintiff is a natural individual who, according to the Petition, is a citizen of Tulsa County, State of Oklahoma. (Ex. 1, Petition, p. 1.)

4. AIGPCC is a Pennsylvania company with its principal place of business at 175 Water Street, New York, New York, 10038.

5. Integro is a Delaware corporation with its principal place of business at 1 State Street Plaza, 9th Floor, New York, New York, 10004.

6. Plaintiff asserts claims against Defendants for allegations of breach of contract, breach of the duty of good faith and fair dealing, and negligence procurement and maintenance of insurance. Plaintiff seeks to recover damages in excess of \$75,000 in connection with each of the above claims, as well as punitive damages and attorneys' fees and costs. (Ex. 1, Petition, pp. 3-9.)

7. Defendants deny any and all alleged wrongdoing and any and all liability to Plaintiff. Defendants and each of them have not yet filed a responsive pleading in the state court action. By filing this Notice of Removal, Defendants do not waive any defenses that may be available to them or each of them.

8. AIGPCC was served with the Summons and Petition in the State Action on

August 21, 2017. Integro was served with the Summons and Petition in the State Action on August 16, 2017. This Joint Notice of Removal is being timely filed within thirty (30) days of service of the Summons and Petition pursuant to 28 U.S.C. § 1446(b).

9. Pursuant to 28 U.S.C. § 1446(a), a copy of the Petition and Summonses that Plaintiff served on Defendants are attached hereto as **Exhibit 1**. No further processes or pleadings have been served on Defendants.

10. Pursuant to Local Civil Rule 81.2, a copy of the state court docket sheet is attached hereto as **Exhibit 2**.

11. The only other filings to date are as follows:

- Entry of Appearance, **Exhibit 3**.
- Special Entry of Appearance and Reservation of Time to Respond, **Exhibit 4**.
- Unopposed Motion for Extension of Time to Respond to Petition by Defendant Integro USA Inc. as Successor-By-Merger to Robertson Taylor International Insurance Brokers, Inc., **Exhibit 5**.
- Order Granting Unopposed Motion for Extension of Time to Respond to Petition by Defendant Integro USA Inc. as Successor-By-Merger to Robertson Taylor International Insurance Brokers, Inc., **Exhibit 6**.
- Dismissal Without Prejudice, **Exhibit 7**.

12. All Defendants join in this Joint Notice of Removal. The Petition originally named American International Group, Inc. as a Defendant (Ex. 1), but, as noted

in footnote 1, above, that party has since been dismissed without prejudice (Ex. 7).

13. Service of this Notice of Removal is being made on all parties listed on the attached Certificate of Service as required by 28 U.S.C. § 1446(d).

14. Promptly after filing this Notice of Removal, and as required by 28 U.S.C. § 1446(d), Defendants will serve on Plaintiff and file with the Clerk of the District Court of Tulsa County, Oklahoma, a “Notice of Filing of Notice of Removal to Federal Court” in the form attached hereto as **Exhibit 8** that will include a copy of this Notice of Removal as an exhibit thereto.

WHEREFORE, Defendants respectfully prays that this action be removed to this Court for further proceedings as though this action had originally been instituted in this Court.

Respectfully submitted,

s/ John C. Lennon

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**ATTORNEYS FOR DEFENDANT  
AIG PROPERTY CASUALTY  
COMPANY**

-and-

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**ATTORNEYS FOR DEFENDANT  
INTEGRO USA INC.  
(SUCCESSOR-BY-MERGER  
TO NAMED DEFENDANT  
ROBERTSON TAYLOR  
INTERNATIONAL INSURANCE  
BROKERS, INC.)**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document was served on all counsel of record, listed below pursuant to the Federal Rules of Civil Procedure, on September 15, 2017.

Reggie N. Whitten  
Michael Burrage  
J. Revell Parrish

**Attorneys for Plaintiff  
Kathryn Taylor**

s/ John C. Lennon  
John C. Lennon